

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JENNIFER CAMACHO,
JENNIFER CAMACHO as next best friend of
JASMIN E. VELEZ, and
JENNIFER CAMACHO as next best friend of
DANIEL VELEZ,

Plaintiffs,

C.A. NO.: 1:19-cv-10378-RWZ

vs.

HANNAH ROBBINS and MICHAEL ROBBINS,

Defendants.

JOINT DISCOVERY PLAN PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to Local Rule 16.1(D), the parties submit the following joint discovery plan:

I. AGENDA OF MATTERS

The primary matters to be discussed at the scheduling conference are as follows:

1. The parties' proposed pretrial schedule set forth below.
2. Written discovery anticipated by each side.
3. Documents to be provided by each side.
4. Depositions to be taken by each side.

II. PROPOSED PRETRIAL SCHEDULE

After conferring in accordance with Local Rule 16.1, the parties have reached agreement on the proposed discovery plan and schedule for filing motions set forth below:

A. PROPOSED DISCOVERY PLAN

1. The scope of discovery in this matter shall conform to the requirements set forth in Fed. R. Civ. P. 26(b).

2. Taking into account the desirability of conducting phased discovery, the parties propose the following schedule:

PHASE I: Developing information needed for a realistic assessment of the case.

- a. Initial disclosures prepared in accordance with Fed. R. Civ. P. 26(a)(1) will be exchanged by May 31, 2019.
- b. All fact discovery, including depositions (but excluding expert depositions), will be completed on or before September 30, 2019.
- b. The parties will be limited to twenty-five (25) interrogatories per side, in accordance with Local Rule 26.1(c).
- c. The parties will be limited to twenty-five (25) requests for admissions per side, in accordance with Local Rule 26.1(c).
- d. The parties will be limited to two (2) separate sets of requests for production per side, in accordance with Local Rule 26.1(c).

PHASE II: Developing information needed to prepare for trial.

- a. Plaintiffs will provide his expert witness disclosure to the defendants in accordance with Fed. R. Civ. P. 26(a)(2) on or before November 30, 2019.
- b. Depositions of the Plaintiffs' expert witnesses will be conducted on or before December 30, 2019.
- c. Defendants will provide its expert witness disclosure to the plaintiffs in accordance with Fed. R. Civ. P. 26(a)(2) on or before December 30, 2019.
- d. Depositions of the Defendants' expert witnesses will be conducted on or before January 31, 2020.

B. PROPOSED SCHEDULE FOR FILING MOTIONS

1. All motions for amendments to pleadings will be filed and served on or before June 30, 2019.
2. Fed. R. Civ. P. 56 motions will be filed and served on or before December 31, 2019.
3. Oppositions to Fed. R. Civ. P. 56 motions will be filed and served on or before January 31, 2020.

III. CERTIFICATIONS

The certifications required by Local Rule 16.1(D)(3) will be filed separately by each party.

Respectfully submitted,
Plaintiffs,
By their attorney,

/s/ John Lee Diaz

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Defendants,
By their attorney,

/s/ David M. Lentini, II

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Dated: April 16, 2019

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants this 16th day of April, 2019.

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Boston, MA 02118

/s/ David M. Lentini, II

David M. Lentini, II, Esq.